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CITY OF CONCORD POLICE DEPARTMENT

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FEDERAL COMMUNICATIONS COMMISSION May 19, 1993 OFFICE OF THE SECRETARY

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FCC MAIL ROOM

CITY COUNCIL

Nancy Gore, Mayor Mark DeSaulnier, Vice Mayor Byron Campbell Colleen Coll Lloyd D. Mashore Rita Hardin, City Manager

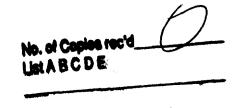
Ms. Donna R. Searcy, Secretary Federal Communications Commission 1919 M Street N.W. - Room 222 Washington, DC 20554

> RE: PR DOCKET NO. 92-235

Dear Ms. Searcy:

In the matter of the revision of the Private Land Mobile Radio (PLMR) Services and the modification of the policies governing those services (PR Docket No. 92-235, the replacement of Part 90 by Part 88), we have the following comments:

- WE DISAGREE WITH PR DOCKET 92-235 AS IT IS CURRENTLY PROPOSED. 1.
- The fire, law enforcement, and ambulance agencies of Contra 2. Costa County serve a population of over 850,000. equipment costs alone to meet the proposed requirements of PR Docket 92-235 are estimated at over FOURTEEN (14) MILLION DOLLARS. This estimate is based on the 108 base stations and 1,737 mobile and portable radios in the county's largest police, fire, and public works affected agencies. County and city governments are experiencing severe budget cutbacks, including layoffs, and simply will not be able to meet the mandate as proposed.
- 3. In effect, PR Docket 92-235 is a locally mandated program; therefore, we believe that the federal government should provide a changeover funding source, such as seed funding through block grants for local government agencies.
- The current licensee should remain the licensee for the 4. narrowband channels which will be split out of the wideboard channel, up to the year 2005, which will be ten years from adoption of the FCC regulations. This will give local governments the time required to make such a tremendous changeover in equipment which the new narrowband channels will require.



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